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EXHIBIT A
(Proposed Order)

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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company
☒ Affects both Debtors

** All papers shall be filed in the Lead
Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**[PROPOSED] ORDER GRANTING
REORGANIZED DEBTORS AND FIRE VICTIM
TRUST'S JOINT *EX PARTE* MOTION TO
EXTEND, IN PART, DEADLINE TO COMPLY
WITH ORDER ON MOTION OF WILLIAM B.
ABRAMS AUTHORIZING DISCOVERY
REGARDING ADMINISTRATION OF THE FIRE
VICTIM TRUST**

[No Hearing Requested]

1 Upon the joint *ex parte* motion, dated August 29, 2022 (the “**Joint Motion**”), of PG&E
2 Corporation and Pacific Gas and Electric Company, as debtors and reorganized debtors (collectively, the
3 “**Debtors**” or “**Reorganized Debtors**”) and the PG&E Fire Victim Trust (the “**FVT**”) in the above-
4 captioned chapter 11 cases (the “**Chapter 11 Cases**”), pursuant to sections 105(a) and 107(b) of title 11
5 of the United States Code (the “**Bankruptcy Code**”), Rule 2004 of the Federal Rules of Bankruptcy
6 Procedure (the “**Bankruptcy Rules**”), and Rule 9006-1(c) of the Bankruptcy Local Rules for the United
7 States District Court for the Northern District of California (the “**Bankruptcy Local Rules**”), for entry
8 of an order extending the September 6, 2022 deadline established in the Court’s August 2, 2022 *Order*
9 *on Motion of William B. Abrams Authorizing Discovery Regarding Administration of the Fire Victim*
10 *Trust* [Dkt. No. 12682] (the “**Discovery Order**”), solely with respect to the FVT’s disclosure and posting
11 of the July 26, 2022 settlement between the Reorganized Debtors, the FVT and certain former directors
12 and officers of PG&E (the “**D&O Action Settlement**”) and its terms, until October 3, 2022; and
13 consideration of the Joint Motion and the requested relief being a core proceeding pursuant to 28 U.S.C.
14 § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and the
15 Court having found and determined that notice of the Joint Motion as provided to the parties listed therein
16 is reasonable and sufficient, and it appearing that no other or further notice need be provided; and this
17 Court having reviewed the Joint Motion and the Declaration of Robin J. Reilly submitted in support of
18 the Joint Motion (the “**Reilly Declaration**”); and this Court having determined that the legal and factual
19 bases set forth in the Joint Motion establish just cause for the relief granted herein; and it appearing that
20 the relief requested in the Joint Motion and the Reilly Declaration is in the best interests of the
21 Reorganized Debtors, their estates, creditors, shareholders, and all parties in interest; and upon all of the
22 proceedings had before this Court and after due deliberation and sufficient cause appearing therefor,

23 **IT IS HEREBY ORDERED THAT:**

- 24 1. The Joint Motion is granted as provided herein.
- 25 2. The September 6, 2022 deadline for the FVT to disclose and post the D&O Action
26 Settlement pursuant to the Discovery Order is hereby extended to, and includes, October 3, 2022.
- 27 3. Notice of the Joint Motion as provided therein shall be deemed good and sufficient and
28 the requirements of the Bankruptcy Local Rules are satisfied by such notice.

1 4. The Reorganized Debtors and the FVT are authorized to take all necessary actions to
2 effectuate the relief granted pursuant to this Order in accordance with the Joint Motion.

3 5. This Court shall retain jurisdiction to hear and determine all matters arising from or
4 related to the implementation, interpretation, or enforcement of this Order.

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6 ** END OF ORDER **
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